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ROBERT NORSE

**EXHIBIT A**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

ROBERT NORSE,

Plaintiff,

vs.

CITY OF SANTA CRUZ, et al.,

Defendants.

) No. C 02-01479 RMW

) **STIPULATION AND ORDER TO EXTEND**  
) **DEADLINE FOR FILING MOTION FOR**  
) **NEW TRIAL AND FOR FILING**  
) **OPPOSITION TO THE MOTION**

IT IS HEREBY STIPULATED BETWEEN David J. Beauvais, attorney for plaintiff, and George Kovacevich, attorney for defendants, that the time for filing a motion for new trial be extended and that opposition to such motion be extended as follows: The motion for a new trial shall be filed on or before April 10, 2013. The opposition to said motion shall be filed on or before May 10, 2013. The hearing on said motion shall be calendared no less than three weeks following defendants opposition papers, at the convenience of the court.

This stipulation is made with reference to the following facts:

1. The court entered judgment on February 21, 2013. Plaintiff's motion for a new trial is due on March 21, 2013.

2. Both counsel for the plaintiff represent the plaintiffs in an action entitled *Golin v. Allenby*, San Mateo County Superior Court docket No. 517053. The *Golin* case has been designated complex under the California Rules of Court. It involves ten sets of defendants, most of whom have filed motions scheduled to be heard on April 8 and April 12. The due date for plaintiffs' submissions is March 22. Filing oppositions to the defendants' motions has taken a great deal of time and plaintiffs' counsel are unable to file the motion for a new trial by the March 21 deadline.

3. Plaintiffs' counsel will be able to file the new trial motion no later than April 10 and request leave of court to extend the time in the interests of justice.

4. Defense counsel expects to be in trial at the time opposition would be due under the proposed schedule. Accordingly, the parties agree that opposition to the motion for new trial be filed on or before May 10, 2013.

5. The parties further agree that the motion be scheduled for hearing no earlier than three weeks following the filing of defendants' opposition and that a reply, if any, be filed one week after the filing of the opposition papers.

DATED: March 18, 2013

/s/ David J. Beauvais  
DAVID J. BEAUVAIS  
Attorney for Plaintiff

DATED: March 18, 2013

/s/ George Kovacevich  
**GEORGE KOVACEVICH**  
 Attorney for Defendants

**ORDER**

The Court having considered the stipulation of the parties and good cause appearing therefor:

IT IS HEREBY ORDERED THAT plaintiff is granted an extension of time to April 10, 2013 to file a motion for new trial. Opposition to the motion shall be filed no later than May 10, 2013. A reply, if any, shall be filed within seven days of the filing of the opposition and a hearing date shall be set no earlier than two weeks following the filing of the reply.

DATED: ~~HEFH~~

  
UNITED STATES DISTRICT JUDGE